

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

CLERKS OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

September 13, 2024

LAURA A. AUSTIN, CLERK

BY s/ S. MELVIN  
DEPUTY CLERK

IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH GOOGLE  
ACCOUNTS:

- (1) ITSTHATDRIP@GMAIL.COM;
- (2) BTURNER229011@GMAIL.COM;
- (3) NGETITGO@GMAIL.COM; AND
- (4) MOONLITENTSERVICES@GMAIL.COM

THAT IS STORED AT PREMISES  
CONTROLLED BY GOOGLE, LLC

Case No. 3:24-mj-00055

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Mary Grace Echols, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION**

**A. Purpose of Affidavit**

1. I make this affidavit in support of an application for a search warrant for information associated with certain accounts that are stored at a premises owned, maintained, controlled, or operated by Google, LLC (“Google”), an electronic communications service provider headquartered at 1600 Amphitheater Parkway, Mountain View, California 94043. The accounts to be searched are: (1) itsthatdrip@gmail.com (hereinafter, “TARGET ACCOUNT 1”); (2) bturner229011@gmail.com (hereinafter, “TARGET ACCOUNT 2”); (3) Ngetitgo@gmail.com (hereinafter, “TARGET ACCOUNT 3”); and (4) moonlitentservices@gmail.com (hereinafter “TARGET ACCOUNT 4”) (collectively, the “TARGET ACCOUNTS”), which are further described in the following paragraphs and in Attachment A, respectively. The information to be searched, disclosed, and seized is described

in the following paragraphs and in Attachment B. Attachments A and B are incorporated herein by reference.

2. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Google to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe the TARGET ACCOUNTS contain evidence of and were used in connection with violations of 18 U.S.C. § 2421(a) (Transportation for the purpose of prostitution) and 18 U.S.C. § 1591 (Sex Trafficking). There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband, and/or fruits of these crimes further described in Attachment B. In executing such a search warrant, your affiant expects to find records that identify the owner of the email accounts to include IP information, geolocation, addresses, phone numbers, payment information, linked accounts and devices, possible additional evidence related to communications setting up commercial sex transactions, and potential evidence of additional crimes or victims.

**B. Agent Background and Experience**

4. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Charlottesville Resident Agency of the Richmond Field Office. I have been employed with the FBI since November 2017. As part of my training to become a Special Agent, I received approximately 18 weeks of instruction at the FBI Academy. Since graduating from the Academy,

I have received further training in federal law, including, but not limited to, violations related to human trafficking.

5. As an FBI Special Agent, I have conducted and participated in investigations for various violations to include crimes against children and human trafficking. I have training and experience in interviewing and in interrogation techniques, arrest procedures, the execution of searches, evidence review, and various other procedures and investigative methods. In addition to using the aforementioned investigative techniques, during these investigations, I also have analyzed data, such as telephone records, subscriber records, IP address logs, and financial records. I have personally participated in the execution of search warrants involving the search and seizure of computer equipment, electronics, cloud-storage accounts, and social media accounts.

6. Through training, experience, and my participation in the subject investigation, I have become familiar with the methods used by those involved in sex trafficking to post advertisements for sexual encounters, how sex traffickers control their victims, and how profits are derived from such conduct. In general, sex trafficking is the recruitment, harboring, transportation, provision, or obtaining a person for the purposes of engaging in commercial sex acts in which the commercial sex act is induced by force, fraud, or coercion or in which the person is under the age of 18 years old. I have also become familiar with slang or coded terms used in connection with sex trafficking through the review of digital communications evidence obtained through seized electronics, review of online ads and posts, interviews with sex trafficking victims, speaking with experienced agents and investigators, and other means. Prior to becoming a Special Agent, I was assigned to the Atlanta, Georgia, FBI Office's Crimes Against Children and Human Trafficking Unit, providing tactical and administrative assistance for child sexual exploitation and human trafficking investigations.

**C. Sources of Information**

7. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses which I believe to be reliable. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause to conduct a search of and for the items described in Attachments A and B for evidence, contraband, and/or instrumentalities of the criminal conduct described herein. Additionally, unless otherwise indicated, wherever in this Affidavit I assert that an individual made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement. Furthermore, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. Finally, this affidavit reflects my current understanding of facts relating to this investigation, but my understanding may change in the future as the investigation proceeds and new information is gathered.

**II. TARGET OFFENSES**

8. Based on the facts set forth below, I assert there is probable cause to believe the TARGET ACCOUNTS have been used in connection with and in furtherance of the Target Offenses listed below. The elements of these offenses are as follows:

- a. Transportation for Purposes of Prostitution, in violation of 18 U.S.C. § 2421(a):
  - i. the defendant knowingly transported any individual in interstate commerce;  
and
  - ii. the purpose of the travel was for the individual to engage in prostitution or any sexual activity for which a person can be charged with a criminal offense.

b. Sex Trafficking, in violation of 18 U.S.C. § 1591:

- i. the defendant knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, advertised, patronized, or solicited the victim;
- ii. the defendant knew or recklessly disregarded the fact that force, threats of force, fraud, or coercion would be used to cause the victim to engage in a commercial sex act; and
- iii. the offense was in or affected interstate or foreign commerce.

### **III. JURISDICTION**

9. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

### **IV. BACKGROUND CONCERNING GOOGLE ACCOUNTS<sup>1</sup>**

10. Google is a United States company that offers to the public through its Google Accounts a variety of online services, including email, cloud storage, digital payments, and productivity applications, which can be accessed through a web browser or mobile applications. Google also offers to anyone, whether or not they have a Google Account, a free web browser called Google Chrome, a free search engine called Google Search, a free video streaming site called YouTube, a free mapping service called Google Maps, and a free traffic tracking service

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<sup>1</sup> The information in this section is based on information published by Google on its public websites, including, but not limited to, the following webpages: the “Google legal policy and products” page available to registered law enforcement at [lens.google.com](https://lens.google.com); product pages on [support.google.com](https://support.google.com); or product pages on [about.google.com](https://about.google.com).

called Waze. Many of these free services offer additional functionality if the user signs into their Google Account.

11. In addition, Google offers an operating system (“OS”) for mobile devices, including cellular phones, known as Android. Google also sells devices, including laptops, mobile phones, and tablets. Users of Android and Google devices are prompted to connect their device to a Google Account when they first turn on the device, and a Google Account is required for certain functionalities on these devices.

12. Signing up for a Google Account automatically generates an email address at the domain gmail.com. That email address will be the log-in username for access to the Google Account. Additional email addresses (“recovery,” “secondary,” “forwarding,” or “alternate” email addresses) can be associated with the Google Account by the user.

13. Google advertises its services as “One Account. All of Google working for you.” Once logged into a Google Account, a user can connect to Google’s full suite of services offered to the general public, described in further detail below. In addition, Google keeps certain records indicating ownership and usage of the Google Account across services, described further after the description of services below.

- a. Gmail - The contents of all emails associated with the account, including stored or preserved copies of emails sent to and from the account, draft emails, and deleted emails; attachments; the source and destination addresses associated with each email; the size, length, and timestamp of each email; and true and accurate header information including the actual IP addresses of the sender and recipients of the emails.
- b. Messaging - The contents of all text, audio, and video messages associated with the account, including Chat, Duo, Hangouts, Meet and Messages (including SMS, MMS,

- and RCS), in any format and however initially transmittal including, but not limited to: deleted and draft messages, including, attachments and link; the source and destination addresses associated with each communication. including IP addresses; the size, length, and timestamp of each communication, user settings; and all associated logs, including access logs and change history.
- c. Photos - The contents of all media associated with the account in Google Photos, including: photos, GIFs, videos, animations, collage, icons, or other data uploaded, created, stored, or shared with the account, including drafts and deleted records; accounts with access to or which previously accessed each record; any location, device, or third-party application data associated with each record; and all associated logs of each record, including the creation and change history, access logs, and IP addresses.
  - d. Maps - All maps data associated with the account, including Google Maps and Google Trips, including: all saved, starred, and privately labeled locations; search history; routes begun; routes completed; mode of transit used or directions; My Maps data; account and identifiers receiving or sending Location Sharing Information to the account; changes and edits to public places; and all associated logs, including IP addresses, location data. and timestamps and change history.
  - e. Location History - All Location History and Web & App Activity indication the location at which the account was active, including the source of the data, date, and time, latitude and longitude, estimated accuracy, device and platform, inferences drawn from sensor data (such as whether user was at rest, walking, biking, or in car), and

- associated logs and user settings, including Timeline access logs and change and deletion history.
- f. Chrome and My Activity - All Internet search and browsing history, and application usage history, including Web & App Activity, Voice & Audio History, Google Assistant, and Google Home, including: search queries and clicks, including transcribed or recorded voice queries and Google Assistant responses; browsing history, including application usage; bookmark; passwords; autofill information; alerts, subscriptions, and other automated searches, including associated notifications and creation dates; user settings; and all associated logs and change history.
  - g. Google Voice - All Google Voice records associated with the account, including: forwarding and other associated telephone numbers, connection records; call detail records; SMS and MMS messages, including draft and deleted messages; voicemails, including deleted voicemails; user settings; and all associated logs. including access logs, IP addresses, location data, timestamps, and change history.
  - h. Google Drive – Google Drive is a cloud storage service automatically created for each Google account. Users can store an unlimited number of documents created by Google productivity applications like Google Doc, Google Sheets, Google Forms, and Google slides. Users can upload files to Google Drive, including photos, videos, PDFs, and text documents, until they hit the storage limit. Users can set up their personal computer or mobile phone to automatically back up files to their Google Drive account. Each user gets 15 gigabytes of space for free on servers controlled by Google and may purchase



more through a subscription plan called Google One. In addition, Google preserves files stored in Google Drive indefinitely, unless the user deletes them.

- i. Google One- Google is a backup service for photos, videos, contacts, and more on a mobile device. A user is able to restore content/transfer content to a new device.

14. Google integrates its various services to make it easier for Google Accounts to access the full Google suite of services. For example, users accessing their Google Account through their browser can toggle between Google Services via a toolbar displayed on the top of most Google service pages, including Gmail and Drive. Google Hangout, Meet, and Chat conversations pop up within the same browser window as Gmail. Attachments in Gmail are displayed with a button that allows the user to save the attachment directly to Google Drive. If someone shares a document with a Google Account user in Google Docs, the contact information for that individual will be saved in the user's Google Contacts. And if a user logs into their Google Account on the Chrome browser, their subsequent Chrome browser and Google Search activity is associated with that Google Account, depending on user settings.

15. Based on information provided by Google in response to a grand jury subpoena for the TARGET ACCOUNTS, the subscriber utilized several Google services to include the following: Gmail, Google Calendar, Android, Location History, Google Payments, Google One Phone Backup, Google Keep, Google Chat, ChromeOS Login, Google Maps, and Web and App activity.

16. When individuals register with Google for a Google Account, Google asks users to provide certain personal identifying information, including the user's full name, telephone number,

birthday, and gender. If a user is paying for services, the user must also provide a physical address and means and source of payment.

17. Google typically retains and can provide certain transactional information about the creation and use of each account on its system. Google captures the date on which the account was created, the length of service, log-in times and durations, the types of services utilized by the Google Account, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via Google's website or using a mobile application), details about the devices used to access the account, and other log files that reflect usage of the account. In addition, Google keeps records of the Internet Protocol ("IP") addresses used to register the account and accept Google's terms of service, as well as the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the Google Account.

18. Google maintains the communications, files, and associated records for each service used by a Google Account on servers under its control. Even after a user deletes a communication or file from their Google Account, it may continue to be available on Google's servers for a certain period of time.

19. In my training and experience, evidence of who was using a Google account and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. This evidence may establish the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or, alternatively, to exclude the innocent from further suspicion. For example, establishing the identity and physical location of the user of the TARGET

ACCOUNTS, will provide evidence for not only who is facilitating the commercial sex but how the user facilitates commercial sex.

20. Based on my training and experience, messages, emails, voicemails, photos, videos, documents, and internet searches are often created and used in furtherance of criminal activity, including to communicate and facilitate the offenses under investigation. For instance, traffickers will take photographs of victims to be posted in online commercial sex advertisements. When an individual posts on a commercial sex website, they receive an email informing them that the advertisement was successfully created. Thus, stored communications and files connected to a Google Account may provide direct evidence of the offenses under investigation.

21. In addition, the user's account activity, logs, stored electronic communications, and other data retained by Google can indicate who has used or controlled the account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, subscriber information, email and messaging logs, documents, and photos and videos, and the data associated with the foregoing, such as geo-location, date and time may be evidence of who used or controlled the account at a relevant time. As an example, because every device has unique hardware and software identifiers, and because every device that connects to the Internet must use an IP address, IP address and device identifier information can help to identify which computers or other devices were used to access the account. Such information also allows investigators to understand the geographic and chronological context of access, use, and events relating to the crime under investigation.

22. Account activity may also provide relevant insight into the account owner's state of mind as it relates to the offenses under investigation. For example, information on the account may indicate the owner's motive and intent to commit a crime (*e.g.*, information indicating a plan

to commit a crime), or consciousness of guilt (*e.g.*, deleting account information in an effort to conceal evidence from law enforcement).

23. Other information connected to the use of a Google account may lead to the discovery of additional evidence. For example, the apps downloaded from the Google Play store may reveal services used in furtherance of the crimes under investigation or services used to communicate with victims or co-conspirators, to further the scheme. Based on my training and experience, and interviews with victims and witnesses, I know that encrypted messaging applications are utilized to generate phone numbers for commercial sex advertisements, and to communicate with commercial sex customers and victims. Additionally, downloaded applications such as Cashapp are utilized to receive illegally acquired proceeds. Furthermore, emails, instant messages, Internet activity, documents, contact and calendar information can lead to the identification of co-conspirators and instrumentalities of the crimes under investigation.

24. Therefore, Google's servers are likely to contain stored electronic communications and information concerning subscribers and their use of Google services. In my training and experience, such information may constitute evidence of the crimes under investigation.

## **V. PROBABLE CAUSE**

### **A. Overview of Investigation**

25. In February 2023, the FBI initiated an investigation into Brian Lamont Turner ("TURNER") for sex trafficking and related criminal conduct in the Western District of Virginia. The FBI received several reports from local law enforcement agencies identifying TURNER and adult females who were suspected to be engaged in commercial sex. Additional adult females associated with TURNER have been identified from online commercial sex advertisements and

interviews with witnesses. The investigation identified an account on SkiptheGames<sup>2</sup> from which the advertisements depicting potential victims were posted. SkiptheGames records revealed the account is registered to a Google account known to be used by TURNER, TARGET ACCOUNT 1, as explained further below. The account was used to post commercial sex advertisements with photographs depicting the adult females identified by law enforcement. Since the SkiptheGames account was created on December 2, 2022, TURNER used this account to post hundreds of commercial sex advertisements in various cities in Virginia, North Carolina, South Carolina, Maryland, and Pennsylvania.

26. Interviews with several adult females reveal that TURNER has been engaged in the Target Offenses since as early as 2018. One of those adult females, Adult Victim 1 (“AV1”) described meeting TURNER at a hotel in Greensboro, North Carolina in 2019 when she was about eighteen years old and addicted to heroin. At the time, TURNER told AV1 he could give her a better life and she could make money with him. This is consistent with other victims’ statements about TURNER’s recruitment tactics.

27. While AV1 was with TURNER, TURNER transported her and other adult females from Virginia to various states to include North Carolina and South Carolina to engage in commercial sex. TURNER decided which locations AV1 was advertised in and posted the commercial sex advertisements of AV1 and others on commercial sex website SkiptheGames.com and MegaPersonals.eu.<sup>3</sup> TURNER also made hotel reservations and paid for the hotels used to facilitate the commercial sex. Most of the hotel reservations were booked through TURNER’s Priceline account. Additionally, TURNER determined AV1’s schedule and provided AV1 with

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<sup>2</sup> Based on my training and experience, I know that “SkiptheGames” is a commercial sex website.

<sup>3</sup> Based on my training and experience, I know that “Megapersonals” is a commercial sex website.

drugs. TURNER transported AV1 in his vehicle and stayed in the parking lot or in another hotel room while AV1 saw the commercial sex customers. AV1 was required to give at least half of her money from the “dates”<sup>4</sup> to TURNER. Based on interview AV1 and other victims, TURNER primarily received proceeds from commercial sex dates through Cashapp or in cash. Based on my training and experience as an investigator, I know that sex traffickers often control the conduct of their victims by serving as the sole source of income, transportation, and narcotics, as well as remaining in close proximity to limit opportunities for the sex trafficked individual to leave the situation.

28. Additionally, the investigation has revealed that TURNER targets female victims who have drug addictions, recruits them, and uses their drug addictions to control them. TURNER becomes the victims’ source of drug supply in order to get them to follow his instructions and complete commercial sex acts. For instance, during her time with TURNER, AV1 was heavily addicted to drugs and engaged in commercial sex in order to obtain drugs. Throughout her time with TURNER, she continued to use heroin and began using methamphetamine and Percocet. AV1 described TURNER threatening to withhold drugs from her if she did not complete a commercial sex date. In order to prevent drug withdrawals, also known as “dopesickness” because it may involve extreme feelings of illness, AV1 completed the “dates” to ensure TURNER did not withhold drugs from her. AV1 described that TURNER would get aggressive with her and yell at her when she was not doing what she was supposed to do. At times, TURNER became physically violent with AV1 when she asked TURNER for drugs. AV1 witnessed TURNER become physically violent with other adult female victims who worked for him as well. This is consistent

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<sup>4</sup> Based on my training and experience, I know that a “date” is commonly used to refer to the exchange of one or more commercial sex acts for something of value, which is often money.

with what several other adult female victims disclosed about TURNER's use of threats, intimidation, and violence to control them.

**B. Analysis of TARGET ACCOUNT 1**

29. Subpoena records reveal that TURNER utilized several Google accounts to conduct his commercial sex operation from November 2022 through January 2024. Google subpoena records reveal that TARGET ACCOUNT 1 created November 12, 2022, is utilized by TURNER. TARGET ACCOUNT 1 listed a recovery or secondary Google account of TARGET ACCOUNT 2, a Google account registered in TURNER's name. TARGET ACCOUNT 1 also utilized Google Pay, and billing information associated with Google Pay included TURNER's name, address, and telephone number (757) 240-0033. T-Mobile subpoena returns reveal that TURNER is the subscriber for telephone number (757) 240-0033.

30. On June 24, 2023, TURNER linked a Visa debit card ending in 7788 to Google Pay for TARGET ACCOUNT 1. The Visa debit card ending in 7788 was issued by a Cashapp account, "igongetit" (Customer Token ending in 8ydy), utilized by TURNER. The Cashapp account utilized telephone number (434) 234-2995 and an Android device belonging to TURNER. T-Mobile subpoena returns reveal that beginning on June 5, 2023, telephone number (434) 234-2995 and the Android device were registered to TURNER.

31. On August 20, 2023, TURNER linked a Visa debit card ending in 1281 to the Google Pay for TARGET ACCOUNT 1. The Visa debit Card ending in 1281 is maintained by Bancorp Bank. Subpoena records for Bancorp Bank reveal the Visa debit card ending in 1281 is issued to TURNER. TURNER also provided his telephone number (757) 240-0033, as the contact number for Bancorp Bank.

32. TURNER utilized TARGET ACCOUNT 1 to create an account with SkiptheGames and Megapersonals through which he posted hundreds of commercial sex advertisements of adult female victims. According to records from SkiptheGames, advertisements were posted depicting several victims in various cities in Virginia, North Carolina, and South Carolina. There is probable cause to suggest that TARGET ACCOUNT 1 belongs to TURNER and will contain evidence within Google services to include email transactions, location data, Google maps, web activity, photos, videos, and application usage related to the Target Offenses.

**C. Analysis of TARGET ACCOUNT 2**

33. According to Google subpoena records, TARGET ACCOUNT 2, created on November 7, 2022, is utilized by TURNER. TURNER provided his name as the subscriber and provided the recovery Google account as TARGET ACCOUNT 1.

34. TARGET ACCOUNT 2 utilized Google Pay. Billing information associated with Google Pay included TURNER's name, address, and telephone number (757) 240-0033. TURNER linked several debit cards to the account, including a Mastercard debit card ending in 5005 on February 16, 2023. The Mastercard debit card ending in 5005 is maintained by Woodforest National Bank. Subpoena records for Woodforest National Bank reveal the Mastercard debit card ending in 5005 is issued to TURNER.

35. Subpoena records from Enterprise Rent A Car reveal that TURNER paid for rental vehicles with the Mastercard debit card ending in 5005 in April 2023. TURNER provided Enterprise Rent A Car with his driver's license and listed TARGET ACCOUNT 2 in his contact information.

36. On July 9, 2023, TURNER linked a Visa debit card ending in 7788 to Google Pay for TARGET ACCOUNT 2. The Visa debit card ending in 7788 was issued by a Cashapp account,



“igongetit” (Customer Token ending in 8ydy), utilized by TURNER. The Cashapp account utilized telephone number (434) 234-2995 and an Android device belonging to TURNER. T-Mobile Subpoena returns reveal that telephone number (434) 234-2995 and the Android device were registered to TURNER.

37. TURNER also linked the Visa debit card ending in 1281 added on July 12, 2023. The Visa debit card ending in 1281 is maintained by Bancorp Bank. Subpoena records for Bancorp Bank reveal the Visa debit card ending in 1281 is issued to TURNER.

38. TARGET ACCOUNT 2 is linked to a Cashapp account, utilized by TURNER, “SneakyGangGang” (Customer token ending in 1m22), created on November 10, 2022. Subpoena records reveal the Cashapp account is registered to TURNER by name, date of birth, social security number, linked bank accounts, and an Android device belonging to TURNER. The Cashapp account lists two linked cards, the Visa debit card ending in 1281 maintained by Bancorp and the Mastercard debit card ending in 5005 maintained by Woodforest National Bank. Subpoena records for Woodforest and Bancorp reveal the associated bank accounts belong to TURNER.

39. TURNER utilized TARGET ACCOUNT 2 to operate a Priceline account through which he booked and paid for hundreds of hotel reservations in Virginia, North Carolina, and South Carolina in order for adult female victims to engage in commercial sex. TURNER utilized the Cashapp account “SneakyGangGang” linked to TARGET ACCOUNT 2 to receive proceeds from commercial sex dates. Numerous transactions were observed between several adult female victims, to include AV1, and TURNER’s Cashapp accounts. Bank records from Woodforest and Bancorp accounts utilized by TURNER confirm that TURNER paid for the hotel reservations, received illegal proceeds, and frequently traveled to North Carolina, South Carolina, and around Virginia. The records coincide with the location information associated with the SkiptheGames

advertisements linked to TARGET ACCOUNT 1. There is probable cause to suggest that TARGET ACCOUNT 2 belongs to TURNER and will contain evidence within the Google services to include email transactions, location data, Google maps, web activity, photos, videos, and application usage. related to the Target Offenses.

**D. Analysis of TARGET ACCOUNT 3**

40. According to Google subpoena records, TARGET ACCOUNT 3, created on June 5, 2023, is utilized by TURNER. Subpoena records from T-Mobile reveal that TURNER is the subscriber of telephone number (757) 240-0033, which is the recovery telephone number for TARGET ACCOUNT 3. Additionally, the recovery email account for TARGET ACCOUNT 3 is TARGET ACCOUNT 2. TARGET ACCOUNT 3 utilized Google Pay. The billing information for the Google Pay account lists TURNER's name and has several linked Visa debit cards, including a Visa debit card ending in 1281, added June 12, 2023. The Visa debit card ending in 1281 is maintained by Bancorp Bank. Subpoena records for Bancorp Bank reveal the Visa debit card ending in 1281 is issued to TURNER.

41. TARGET ACCOUNT 3 is linked to a Cashapp account utilized by TURNER, "igongetit" (Customer Token ending in 8ydy) created June 6, 2023. The Cashapp account utilized telephone number (434) 234-2995 and an Android device belonging to TURNER. T-Mobile Subpoena returns reveal that telephone number (434) 234-2995 and the Android device were registered to TURNER.

42. TURNER utilized the Cashapp account linked to TARGET ACCOUNT 3 to receive proceeds from commercial sex dates. Numerous transactions were observed between several adult female victims, to include AV1 and TURNER's Cashapp accounts. There is probable cause to suggest that TARGET ACCOUNT 3 belongs to TURNER and will contain evidence

within the Google services to include email transactions, location data, Google maps, web activity, photos, videos, and application usage. related to the Target Offenses.

**E. Analysis of TARGET ACCOUNT 4**

43. TARGET ACCOUNT 4 is linked to a Cashapp account utilized by TURNER, “CEO FATMAC” (Customer token ending in 8m3g), created on October 25, 2023. Cashapp subpoena records link TARGET ACCOUNT 4 to TURNER through name, date of birth, social security number, address, and connected Android device.

44. The Cashapp account “CEO FATMAC” utilized telephone number (434) 234-2995 and the connected device belonging to TURNER. T-Mobile Subpoena returns reveal that telephone number (434) 234-2995 is registered to TURNER. Additionally, TURNER linked the telephone number (434) 439-8238. The telephone number (434) 439-8238, activated through Straight Talk on September 14, 2023, was utilized by TURNER. FBI negotiators communicated with TURNER through telephone number (434) 439-8238 on January 23 and January 24, 2024, during which time TURNER had barricaded himself in a residence when FBI attempted to execute an arrest warrant for TURNER.

45. Google subpoena records for TARGET ACCOUNT 2 belonging to TURNER reveal Google Pay transactions between TARGET ACCOUNT 2’s Google Pay and TURNER’s Cashapp account “CEO FATMAC” that is linked to TARGET ACCOUNT 4. Additionally, TARGET ACCOUNT 2’s Google Pay reveal payments to Straight Talk in October 2023.

46. Furthermore, on August 20, 2023, TURNER signed a limited liability corporation (LLC) State Corporations Commission (SCC) filing for “Moonlit Exotics Ent LLC”. TURNER provided his name and an address for the LLC’s principal office. Based on my training and experience, and conversations with other agents, often times, criminals will launder illegal

proceeds through a business. AV1 disclosed that TURNER knew about the FBI's investigation before the date of this LLC.

47. There is evidence to believe that TURNER created TARGET ACCOUNT 4 to conceal his illegal activity as a "legitimate business". TURNER utilized the Cashapp account linked to TARGET ACCOUNT 4 to receive proceeds from commercial sex dates. There is probable cause to suggest that TARGET ACCOUNT 4 belongs to TURNER and will contain evidence within Google services to include email transactions, location data, Google maps, web activity, photos, videos, and application usage. related to the criminal conduct under investigation.

**F. Analysis of Interstate Travel June 2023**

48. Your affiant reviewed the aforementioned subpoena records from accounts linked to TARGET ACCOUNT 1, TARGET ACCOUNT 2, and TARGET ACCOUNT 3, along with SkiptheGames records to summarize the interstate travel for TURNER, AV1, and Adult Victim 3 (AV3) for the purpose of engaging in commercial sex. TURNER's activity for the time period June 9, 2023 through June 20, 2023 is summarized below.

49. On June 9 and 10, 2023, TURNER posted advertisements of AV1 and AV3 on SkiptheGames for Charlottesville and Lynchburg from an Internet Protocol "IP"<sup>5</sup> address that resolves back to Lynchburg, Virginia. According to TURNER's bank records, TURNER made purchases at Sheetz and Chick-fil-a in Lynchburg, Virginia on June 10, 2023. According to Priceline<sup>6</sup> records, TURNER made a hotel reservation at the Cambia Hotel in Raleigh-Durham on

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<sup>5</sup> Based on my training and experience, I know that an IP address is a unique identifying number assigned to every device connected to the internet. This numerical label can often be used to identify the location of the individual connecting to the internet.

<sup>6</sup> Priceline.com is an online travel agency used to find discount rates for travel-related purchases, such as hotel rooms.

June 11, 2023. Between June 11 through June 14, 2023, TURNER posted advertisements on SkiptheGames for Raleigh and Durham, North Carolina.

50. According to Priceline records, TURNER booked a reservation at the Red Roof Inn in Raleigh, Southwest Cary for June 13 and 14, 2023. The IP addresses for the Priceline reservation and the SkiptheGames advertisements resolve to the area of Cary, North Carolina. TURNER's Cashapp account reveals transactions on June 14, 2023 from an IP address near Cary, North Carolina. On June 13 through June 15, TURNER's bank records reveal payments to Cambria Hotel in Morrisville and the Red Roof Inn in Cary. Additionally, on June 15, 2023, TURNER made a purchase at McDonalds in Cary, North Carolina.

51. On June 15 and June 16, 2023, TURNER posted advertisements on SkiptheGames for AV1 and AV3 in Myrtle Beach, South Carolina. According to Priceline records, TURNER made a reservation at the Sun N Sand Resort in Myrtle Beach, South Carolina on June 15, 2023. Bank records reveal that TURNER made a purchase at The Chemist located in Myrtle Beach, South Carolina on June 16, 2023.

52. Between June 16 and 17, 2023, TURNER posted advertisements on SkiptheGames for Greensboro, North Carolina. On June 16, 2023, TURNER made a reservation through Priceline at the Howard Johnson by Wyndham in Greensboro, North Carolina and on June 17, 2023, TURNER made reservations at the Baymont by Wyndham and the Days Inn in Greensboro, North Carolina. Bank records reveal that TURNER paid for the hotel reservations at the Baymont by Wyndham and the Days Inn in Greensboro on June 17, 2023 and June 18, 2023.

53. Between June 18 and 19, 2023, TURNER posted advertisements on SkiptheGames in Charlottesville, Virginia from an IP address that resolves back to Charlottesville, Virginia. TURNER's Cashapp account reveals transactions on June 19, 2023, from an IP address resolving

to Charlottesville, Virginia. Bank Records reveal that TURNER paid for the DoubleTree in Charlottesville, Virginia on June 19, 2023 and June 20, 2023.

54. Based on the above information, I submit there is probable cause to conclude TURNER transported AV1 and AV3 from Virginia to North Carolina and South Carolina for the purpose of engaging in commercial sex. As described, TURNER utilized TARGET ACCOUNT 1 to post advertisements on SkiptheGames for AV1 and AV3. Additionally, TURNER utilized Priceline linked to TARGET ACCOUNT 2 to book and pay for the hotel rooms in various cities, which are typically used to conduct “dates,” also known as commercial sex encounters. TURNER utilized Cashapp accounts linked to TARGET ACCOUNT 2 and TARGET ACCOUNT 3 to receive proceeds from commercial sex dates.

**G. Analysis of Travel November 2023**

55. Your affiant reviewed the records from accounts linked to TARGET ACCOUNT 1, TARGET ACCOUNT 2, TARGET ACCOUNT 3, and TARGET ACCOUNT 4 to summarize the interstate travel for TURNER, AV1, AV3, and Adult Victim 7 (AV7) for the purpose of engaging in commercial sex. TURNER’s activity for the time period November 6, 2023 through November 21, 2023 is summarized below.

56. On November 6, 2023, TURNER posted an advertisement of AV1 and AV3 and an advertisement depicting AV7 from his account on SkiptheGames for Charlottesville from an IP address that resolves back to Charlottesville, Virginia. Later, on November 6, 2023, TURNER posted an advertisement for Raleigh and Greensboro, North Carolina depicting AV1 and AV3.

According to Bancorp bank records, on November 6, 2023, TURNER made a purchase at a gas station in Yanceyville, North Carolina.<sup>7</sup>

57. On November 7, 2023 through November 9, 2023, TURNER posted advertisements depicting AV1 and AV3 for Raleigh, North Carolina. On November 9, 2023, North Carolina State Highway Patrol pulled over TURNER driving his Blue Mustang bearing license plate TZV6247 in Raleigh, North Carolina. On November 9, 2023, Priceline records reveal TURNER booked a room at the Microtel Inn and Suites in Morrisville, Virginia.<sup>8</sup> Later, on November 9, 2023, the Microtel called local law enforcement about suspected prostitution of TURNER and two young females, AV1 and AV3. The hotel identified the Blue Mustang bearing license plate TZV6247, driven by TURNER and parked in the hotel parking lot. When officers arrived, TURNER, AV1, and AV3 were present in the hotel room. After knocking on the door, officers heard commotion in the hotel room to include constant flushing of the toilet. TURNER, AV1, and AV3 were pulled out of the room. Officers observed evidence of drug use in the room and arrested AV1. TURNER and AV3 were trespassed from the property. Shortly after the incident, TURNER used Priceline to book a room at the Red Roof Inn in Raleigh, North Carolina for November 9, 2023.

58. On November 10, 2023 and November 11, 2023, TURNER posted an advertisement depicting AV3 for Raleigh, North Carolina. TURNER used Priceline to book a room at the Red Roof Inn for November 10, 2023 through November 12, 2023. According to Bancorp records, TURNER made a purchase at a Circle K gas station in Raleigh, North Carolina on

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<sup>7</sup> Yanceyville, North Carolina is located North of Greensboro and Raleigh, North Carolina.

<sup>8</sup> Morrisville, North Carolina is located right outside of Raleigh, North Carolina.

November 12, 2023. Additionally, Bancorp record reveal that TURNER made a 200.00 cash withdrawal from an ATM located in Raleigh, North Carolina.

59. From November 12, 2023 through November 15, 2023, TURNER posted advertisements depicting AV3 and AV7 in Greensboro, North Carolina. On November 14, 2023 and November 15, 2023, License Plate Reader results reveal TURNER's Blue Mustang bearing license plate TZV6247 in Greensboro, North Carolina.

60. Later, on November 15, 2023, posted an advertisement depicting AV3 for Roanoke, Virginia. TURNER used Priceline to book the Quality inn in Roanoke, Virginia for November 15, 2023 through November 17, 2023 and again on November 19, 2023 through November 20, 2023. TURNER continued to post advertisements depicting AV3 and AV7 for the Roanoke, Virginia area through November 21, 2023. According to Snapchat records, TURNER's Snapchat account linked to TARGET ACCOUNT 4 utilized an IP address that resolved to Roanoke, Virginia from November 16, 2023 through November 21, 2023. Additionally, TURNER's Cashapp account utilized the same IP address resolving to Roanoke, Virginia from November 18, 2023 through November 21, 2023.

61. Based on the above information, I submit there is probable cause to conclude TURNER transported AV1 and AV3 from Virginia to North Carolina for the purpose of engaging in commercial sex. As described, TURNER utilized the TARGET ACCOUNT 1 to post advertisements on SkiptheGames for AV1 and AV3. Additionally, TURNER utilized Priceline linked to TARGET ACCOUNT 2 to book and pay for the hotel rooms in various cities. TURNER utilized Cashapp accounts linked to TARGET ACCOUNT 2, TARGET ACCOUNT 3, and TARGET ACCOUNT 4 to receive proceeds from commercial sex dates and make purchases in North Carolina.



**H. Conclusion**

62. Therefore, there is probable cause to believe that TURNER utilized Google services available through the TARGET ACCOUNTS from November 2022 through January 2024,<sup>9</sup> and during the aforementioned travel.

63. TURNER utilized the internet from his mobile device to create and post commercial sex advertisements with photographs depicting adult female victims. Adult female victims, to include AV1, sent photos of themselves to TURNER that were then posted in commercial sex advertisements. Additionally, TURNER also captured photos of the victims for the commercial sex advertisements. TURNER accessed his Priceline account to complete hotel bookings for himself and adult female victims. There is probable cause to believe there is evidence within email transaction information and online activity from SkiptheGames, Megapersonals, and Priceline within the TARGET ACCOUNTS. Additionally, there is probable cause to believe TURNER stored the photos of the victims for commercial sex advertisements within Google Photos.

64. TURNER utilized the three aforementioned Cashapp accounts to receive commercial sex proceeds from victims and commercial sex customers. Additionally, TURNER used messaging applications to communicate with victims and commercial sex customers in order to facilitate commercial sex. Furthermore, TURNER frequently traveled and transported victims to hotels in various states, therefore there is probable cause to believe there will evidence of location data and Google Maps within the TARGET ACCOUNTS. Based on the aforementioned, there is evidence to believe that TURNER utilized applications on his cellphones to engage in the target offenses.

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<sup>9</sup> Brian Turner was arrested on January 24, 2024.

65. Additionally, TURNER utilized Google backup services through Google One to back up his Android cellular devices to cloud storage, therefore there is probable cause to believe evidence to include applications and messaging, photos, videos, contacts utilized on TURNER's cellular device will be available from the TARGET ACCOUNTS.

66. Based on my training and experience as well as knowledge of technology regarding Google services, there is probable cause to believe that the TARGET ACCOUNTS contain evidence of criminal activity to include sex trafficking and transportation across state lines for the purpose of commercial sex.

#### **VI. INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

67. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Google to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

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## VII. CONCLUSION

68. Based on the facts set forth above, I submit that probable cause exists to believe the user of the TARGET ACCOUNTS has violated 18 U.S.C. § 2421(a) (Transportation for the purpose of prostitution) and 18 U.S.C. § 1591 (Sex Trafficking) and that probable cause exists to believe that evidence, fruits, and instrumentalities of such violations will be found within the information associated with these Google, LLC accounts for information generated between November 2022 and January 24, 2024.

Respectfully submitted,

*s/ Mary G. Echols*  
Mary G. Echols, Special Agent  
Federal Bureau of Investigation

Received by reliable electronic means and sworn and attested to by telephone on September 13, 2024.



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Honorable Judge C. Kailani Memmer  
United States Magistrate Judge